CONFLICT OF INTEREST

SALMA ATTAH
FOUNDATION
FOR WOMEN AND GIRLS SUPPORT

Version 2.0 | November 2026

SAFWGS

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Conflict of Interest Policy

Version 2.0 | Approved November 2026 | Next review November 2027

Purpose

SAFWGS depends on the trust of the women and girls it serves, its communities, funders, partners and government. This policy protects that trust by making sure decisions about money, people, partners and programmes are made in the interest of SAFWGS and its mission, and not for anyone's private benefit.
A conflict of interest is not wrongdoing in itself. Failing to declare one, or taking part in a decision while conflicted, is a breach of this policy.

Who this policy applies to

- Board members and trustees
- Staff on any type of contract, including interns and fellows
- Volunteers, consultants and advisers who influence decisions, spending or selection of participants
- Committee members, including procurement and recruitment panels

What counts as a conflict of interest

A conflict of interest exists when a person's private interests, or those of someone close to them, could influence, or could reasonably be seen to influence, a decision they take or contribute to on behalf of SAFWGS. Conflicts can be actual, potential or perceived.
Connected persons include a spouse or partner, parents, children, siblings, in-laws, other relatives in the same household, close friends, a business partner, and any company, NGO or association in which the person has a financial stake, a paid role or a governance role.
Common examples:

- Recommending a supplier, consultant, venue or caterer owned or run by a connected person
- Sitting on a recruitment panel where a relative or friend has applied
- Selecting fellows, scholarship recipients or programme participants who are related to the decision-maker
- Working for, advising or sitting on the board of another organisation applying to the same funder or competing for the same contract
- Accepting gifts, hospitality, per diems or favours from suppliers, partners or government officials connected to SAFWGS work
- Using SAFWGS information, contacts, data or brand for personal gain, a political campaign or a side business

- Holding a political party role while representing SAFWGS in non-partisan civic or accountability work

Declaring interests

On appointment. Every board member, staff member and decision-making volunteer completes a Declaration of Interests form before or on starting, listing relevant roles, business interests, directorships and connected persons.
Every year. Declarations are renewed each January, even if nothing has changed.
When something changes. Update the declaration within 14 days of any new interest.
At meetings and decisions. Declare any interest in an agenda item or decision at the start of the meeting, or before the decision is taken, even if it has already been recorded on the register.
Declarations are sent to the Executive Director, or for the Executive Director and board members, to the Board Chair. Send them by email to info@safwgs.org with the subject line "CONFIDENTIAL – Declaration of Interest".

Conflict of Interest Register

The Executive Director keeps a Conflict of Interest Register recording each declaration, the date, the decision affected and the action taken. The Board Chair keeps the register for board members and the Executive Director. The register is reviewed by the Board at least once a year and is made available to auditors and funders on request.

How conflicts are managed

Once an interest is declared, the person receiving the declaration decides how it will be managed and records the outcome on the register. Options include:

- No action, where the interest is minor and unrelated to the decision
- The conflicted person leaves the discussion and does not vote or score
- The decision, contract or supervision is moved to another person
- Additional checks, such as a third quotation or an independent panel member
- The conflicted person gives up the interest or the related activity
- SAFWGS does not proceed with the transaction

Where a board member is conflicted, they leave the room for the discussion and vote, and the minutes record the declaration and their absence. A transaction with a connected person may only go ahead if it is fair to SAFWGS, the price is at or below market rate, and the Board or Executive Director approves it in writing.

Gifts and hospitality

Gifts and hospitality offered because of a person's role at SAFWGS are covered by this policy.

- Small tokens of appreciation, such as branded items or a modest meal at a meeting, may be accepted without recording
- Gifts or hospitality worth more than ₦20,000, or several gifts from the same source in a year, must be recorded on the Gifts and Hospitality Register within 7 days
- Cash, transfers, airtime and vouchers must never be accepted, whatever the amount
- Nothing may be accepted from a supplier or bidder during a procurement process
- Nothing may be requested or accepted from programme participants or their families

If refusing a gift would cause serious offence, accept it on behalf of SAFWGS, record it, and hand it to the Executive Director.

Breaches

Failure to declare an interest, or taking part in a decision while conflicted, may lead to disciplinary action under the HR Policy, removal from the Board or a committee, or the end of a volunteer or consultancy agreement. Decisions affected by an undeclared conflict may be reviewed and reversed. Anyone who suspects an undeclared conflict should report it under the Whistleblowing Policy.

Related policies

- Procurement Policy
- Finance Policy
- HR Policy
- Whistleblowing Policy

Contact

Questions about this policy: info@safwgs.org or +234 813 693 1762.

Approval

Approved by the Board of SAFWGS in November 2026. This policy will be reviewed in November 2027, or earlier if the law, a funder requirement or SAFWGS's work changes. Approved by the Board of Trustees of SAFWGS by resolution dated 12 November 2026. Signed copies are held by SAFWGS and are available to funders and partners on request.

Annual Declaration of Interests

Name: _____

Role: _____

Interests, roles and connected persons that could create a conflict (write "none" if none):

_____

_____

I have read and understood the SAFWGS Conflict of Interest Policy. I will declare any new interest within 14 days and before any decision in which I have an interest.

Signature: _____ Date: _____

